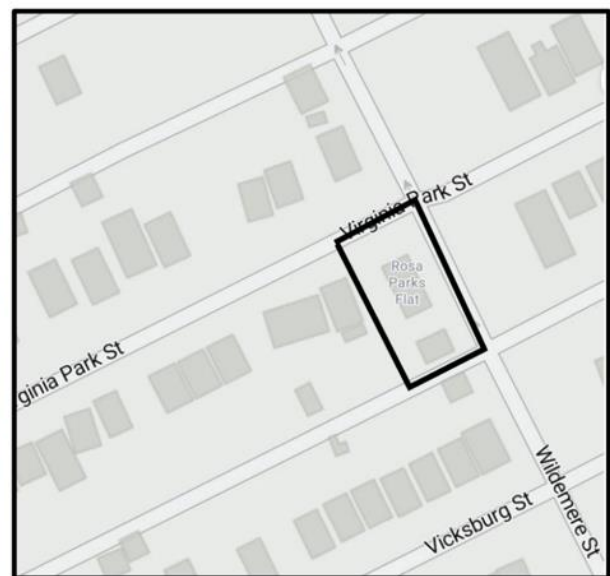


**STAFF REPORT: DECEMBER 11, 2024, REGULAR MEETING  
PREPARED BY: PLANNING AND DEVELOPMENT DEPARTMENT STAFF  
PROPOSED ROSA AND RAYMOND PARKS FLAT HISTORIC DISTRICT  
FINAL REPORT ADOPTED BY HISTORIC DESIGNATION ADVISORY BOARD: NOVEMBER 14,  
2024  
DRAFT ELEMENTS OF DESIGN ADOPTED BY HISTORIC DESIGNATION ADVISORY BOARD:  
NOVEMBER 14, 2024**



*Undated Historic Designation Advisory Board photo of 3201–3203 Virginia Park.*



*Left: Undated Historic Designation Advisory Board photo. Right: Map by Historic Designation Advisory Board.*

## **PROPOSED DISTRICT DESCRIPTION**

The proposed district consists of two buildings: one contributing (historic) two-family house and one contributing (historic) garage at 3201–3203 Virginia Park, along with surrounding yard space and adjacent public rights-of-way.

The property was listed in the National Register of Historic Places on February 5, 2021 (Reference #100006131).

## **BACKGROUND AND CHARGE**

The Historic Designation Advisory Board, which serves as Detroit’s study committee for designation of new historic districts in accordance with the Michigan Local Historic Districts Act, has been directed by the City Council to study the proposed Rosa and Raymond Parks Flat Historic District. Should the Council enact the proposed historic district, both buildings in the district, as well any open spaces included within the boundaries, will come under the Commission’s regulatory jurisdiction for any exterior changes.

The Historic District Commission, according to Sec. 21-2-56 of the Detroit City Code, “shall review” Historic Designation Advisory Board reports pertaining to proposed historic districts. The Commission’s role is advisory only. For consideration by the Commission, Planning and Development Department staff opinion follows.

## **RELATION TO THE DETROIT MASTER PLAN OF POLICIES**

The proposed historic district would support two important goals of the Master Plan:

- Arts and Culture Policy 1.1: Promote Detroit’s history, architectural heritage, and diverse population as cultural resources and assets.
- Historic Preservation Policy 1.1: Undertake assessments to identify and protect structures with historic significance.

The proposed Rosa and Raymond Parks Flat Historic District is in the Rosa Parks area of Cluster 6. The historic district would be consistent with the following:

- Cluster 6, Rosa Parks, Policy 2.2: Preserve and rehabilitate the existing housing stock and construct new affordable and market rate housing in the Virginia Park (northwest of the Lodge Freeway and West Grand Boulevard) and Research Park Urban Renewal Areas (near Trumbull and the Ford Freeway).

The vicinity of 3201–3203 Virginia Park is designated as RLM: Low/Medium Density Residential in the Future General Land Use Map. The proposed historic district would not interfere with continued Low/Medium Density Residential use.

Staff concludes that the proposed historic district is consistent with the Master Plan.

## **PRACTICAL BUDGETARY EFFECTS ON CITY RESOURCES**

As the proposed district consists of two, small-scale buildings, and a relatively small area of land, the effect on City of Detroit resources would be negligible. Should the property owner choose to make changes to the exterior of the property, or should a City of Detroit department initiate work that would affect the property, Historic District Commission staff time would be expended in reviewing the proposed work. No other budgetary effects are likely to occur.

## **LEGAL IMPLICATIONS FOR OWNERS, RESIDENTS, AND THE CITY**

As with any historic district, there are legal implications for owners and public entities, including City of Detroit agencies. The Detroit City Code and the Michigan Local Historic Districts Act require that any “person, individual, partnership, firm, corporation, organization, institution, or agency of government” must first obtain approval from the Historic District Commission before commencing any work affecting the exterior of a property in a historic district. This includes (but is not limited to) demolition, new construction, additions, painting, siding, masonry, windows, doors, roofing, fencing, landscaping, tree removal, and paving. The Commission approves work according to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, and the Notice to Proceed criteria. Proposed work not meeting these standards, guidelines, or criteria is denied. (Detroit City Code Sec. 21-2-171, et seq., MCL 399.205 et seq.)

Property owners will also be required to perform the ongoing maintenance necessary to prevent a situation of “demolition by neglect” (Detroit City Code Sec. 21-2-59).

Residents, whether of the surrounding community or citywide, derive many tangible and intangible benefits from historic districts including fostering civic beauty, community pride, and the stabilization of property values (Detroit City Code Sec. 21-2-1).

Inclusion in a designated “local” historic district (i.e., a historic district established by a Michigan municipality) allows a property to be considered for the Michigan state rehabilitation tax credit (Public Act 343 of 2020). However, the Rosa and Raymond Parks Flat is already eligible for such consideration due to its 2021 listing in the National Register of Historic Places; the enactment of a City of Detroit historic district would not change this eligibility. (Information on how to apply for the credit is found at <https://www.miplace.org/historic-preservation/programs-and-services/historic-preservation-tax-credits/state-historic-tax-credit-program/>.)

## **HISTORICAL AND ARCHITECTURAL VALUES OF THE DISTRICT**

According to the Final Report, the proposed Rosa and Raymond Parks Flat Historic District is significant for its role in Black history and social history (National Register Criterion A) and for its association with the significant individuals Rosa and Raymond Parks (National Register Criterion B), with a period of significance of 1961 through 1988, reflecting the period when Rosa and Raymond Parks lived at the house and were active in Civil Rights Movement activism in Detroit and nationwide. Further, the Final Report establishes the “exceptional importance” (National Register Criteria Consideration G) required for considering the significance of properties that have achieved significance within the past fifty years.

The house, garage, and associated landscape features appear to retain a high degree of integrity relating to the period of significance. Designation as a historic district would potentially preserve the historical and architectural values for which the building is significant.

## **PROPOSED HISTORIC DISTRICT DESIGNATION**

Planning and Development Department staff concurs that the proposed historic district would protect an important historic resource and be consistent with the Master Plan of Policies.

However, the proposed historic district also includes an area that appears to have no historical connection to the property. According to the Description, “[t]oday, the property includes the east 15 feet of lot 431 to the west, which was not part of the original lot.” Per *National Register Bulletin: Defining Boundaries for National Register Properties*, the boundaries of the historic designation should “use the boundaries shown on historic plats or land-ownership maps (such as fire insurance or real estate maps) when the limits of the eligible resource do not correspond with current legal parcels” and “exclude additional, peripheral areas that do not directly contribute to the property’s significance as buffer or as open space to separate the property from surrounding areas.”

Both the Boundary Justification and the List of Contributing and Noncontributing Resources describe this fifteen-foot-wide area as “noncontributing.” However, according to National Register guidance, the non-historic

areas should be excluded from the district boundaries altogether. Local historic districts in Michigan are required to follow the National Register guidelines quoted above.<sup>1</sup>



2022 Google Maps image depicting the proposed district. The “noncontributing” 15-foot-wide portion of the parcel comprises the area at the right of the image enclosed by chain-link fence.

Finally, the district map provided in the Final Report (see first page, above) does not provide the level of precision and detail found in other designated districts. The Planning and Development Department suggests the boundary be depicted on a measured drawing (Sanborn map, Detroit parcel map, or architectural site plan) showing exact locations of buildings, public rights-of-way, and other permanent features of historic significance. Both contributing buildings should be identified as such. Maps from internet navigation services usually do not reflect actual street widths, building locations, or parcel boundaries, and we have found these types of maps to be confusing to both the public, and other City of Detroit agencies, on several occasions.

## **PROPOSED ELEMENTS OF DESIGN**

It appears that several non-original features on the property may nonetheless be reflective of the 1961–1988 period of significance and warrant continued preservation. The Planning and Development Department is concerned that the Final Report and draft Elements of Design do not clearly identify whether these non-original features are important (e.g., if they were installed prior to 1988). These features include:

- Metal porch railings
- Aluminum storm windows
- Chain-link fence in back yard
- Hedges along the foundation and the north side of the property

In the future, if deteriorated features were to be replaced, or if an addition were to be constructed, the Elements of Design would be used to provide direction as to whether the features identified above should be considered significant and as to what new materials would be appropriate or inappropriate.

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<sup>1</sup> Michigan Department of History, Arts and Libraries; Michigan Historical Center; and Michigan State Historic Preservation Office, *Criteria for Evaluating Resources for Inclusion in Local Historic Districts*, <https://www.miplace.org/4a7781/globalassets/documents/shpo/programs-and-services/local-historic-districts/creating-a-local-historic-district/criteria-for-evaluating-resources-for-inclusion-in-local-historic-districts.pdf>, August 19, 2002.